

EXHIBIT 2

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, JOHN DOE, JANE DOE 1, JANE
DOE 2, and JANE DOE 3,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSELY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL “ENOCH”
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

DECLARATION OF JANE DOE 2

I, Jane Doe 2, declare as follows.

1. I am over the age of eighteen years, and the facts set forth herein are true and correct to the best of my personal knowledge, information, and belief.

2. I am a female resident of Charlottesville, Virginia. I am a member of Congregation Beth Israel in Charlottesville.

3. My daughters are Jane Doe 1 and Jane Doe 3.

4. On August 12, 2017, I peacefully protested Defendants' neo-Nazi and white supremacist rally in Charlottesville, along with Jane Doe 1 and Jane Doe 3.

5. Defendants and the other rally participants carried racist and anti-Semitic signs and wore Confederate insignia and Nazi swastikas. They yelled and chanted anti-Semitic and pro-Nazi slogans, such as "Heil Hitler," "Jews will not replace us," and "blood and soil."

6. Later that day, a friend called to tell me that my daughter, Jane Doe 1, had been struck by a vehicle while she was on Fourth Street in downtown Charlottesville. We couldn't reach Jane Doe 3, so my husband and I drove to the UVA Hospital. Soon Jane Doe 3 called us and said she was with Jane Doe 1 in the ambulance and they were being diverted to Martha Jefferson Hospital, so we rushed to meet them there. Outside the Emergency Room entrance I found Jane Doe 3, who collapsed into my arms, emotionally and physically drained. The hospital was on lockdown and I was not allowed inside the Emergency Room to see my daughter, Jane Doe 1.

7. My other daughter, Jane Doe 3, and I waited four hours for Jane Doe 1 to be released. While in the waiting room, I watched in horror as the news repeatedly played video of Defendant Fields driving a car into the crowd where my daughters had been.

8. I suffer great emotional distress as a result of the events on August 12. Since then, I have been unable to resume my normal life. I have spent much of my time caring for Jane Doe 1, due to her injuries. I also sought psychological support for myself and my family, and suffer from anxiety, which manifests in difficulty sleeping and focusing.

9. In the aftermath of the events on August 11-12, I have met with a security expert and have taken steps to increase my safety and guard against further harm from Defendants and their supporters.

10. I fear that if my identity is disclosed in this action, I will be targeted by Defendants and/or their supporters and sympathizers because I am a plaintiff, a member of Congregation Beth Israel, and was a counter-protester. I am afraid that I will be subjected to threats, harassment, violence, and other physical and mental harm. Furthermore, if my identity is disclosed, the identities of my daughters, Jane Doe 1 and Jane Doe 3, are compromised. As victims of the car attack by Defendant Fields, my daughters have suffered physical and mental harm. They are fearful of being the targets of further harm.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct. Executed this 13th day of November, 2017 in Charlottesville, Virginia.

/s/ Jane Doe 2
Jane Doe 2

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